

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	
BRIAN TODD and	)	CR. NO. 04-10246-PBS
SHAUN TODD	)	

**GOVERNMENT'S LIST OF PROPOSED EXHIBITS**

The United States of America, through its attorneys Michael J. Sullivan, United States Attorney, and Assistant United States Attorneys Donald L. Cabell and Waqar Hasib, hereby submits the following list of proposed exhibits which it may use during its case-in-chief at trial. The government respectfully reserves the right to amend or supplement this list of its proposed exhibits.

1. Various photographs of the ATM at 223 Lowell Street in Wilmington, MA;
2. Fleet Bank records reflecting activity at the ATM at 223 Lowell Street on October 16, 2000.
3. Brinks personnel records for Brian Todd;
4. Brinks log sheet of activity for Carlos Cotes and Michael Tyson for October 16, 2000;
5. Brinks delivery "Picklists" for October 16, 2000;
6. Pro Sound invoices reflecting work performed on defendants' Ford escape, Dodge Dakota and Nissan Maxima;
7. Various pictures of hardware installed in defendants' vehicles;
8. Records reflecting purchase of Nissan Maxima by Shaun Todd;
9. Records reflecting purchase of 1998 Ford Expedition;

and

10. Record reflecting trade-in of Ford Expedition.

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

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